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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERRI CARFAGNO, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

DIGITAL MOOSE, LLC,

Defendant.

Case No.: 2:20-cv-00458-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEFENDANT DIGITAL
MOOSE, LLC'S DEADLINE TO
RESPOND TO COMPLAINT**

[FIRST REQUEST]

Defendant DIGITAL MOOSE, LLC ("Digital Moose"), by and through its counsel, Armstrong Teasdale LLP, and Plaintiff TERRI CARFAGNO ("Plaintiff"), by and through her counsel, Eisenband Law P.A. (admitted *pro hac vice*), Krieger Law Group, LLC, and Hiraldo P.A. (LR IA 11-2 compliance pending), hereby agree and stipulate, subject to this Court's approval, to extend the deadline for Digital Moose to answer or otherwise respond to the Complaint by 21 days, or from March 30, 2020, to April 20, 2020. This is the first request to extend this particular deadline.

On March 4, 2020, Plaintiff filed a Complaint on behalf of herself and putative class members against Digital Moose alleging claims under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (ECF No. 1). The Summons and Complaint were served on Digital Moose on March 9, 2020. Therefore, pursuant to Fed. R. Civ. P. 12(a), Digital Moose's deadline to answer or otherwise respond to the Complaint is March 30, 2020.

Good cause exists to extend the deadline for Digital Moose to respond to the Complaint by

21 days, or to April 20, 2020. Counsel for Digital Moose was recently retained and requests additional time to prepare its responsive pleading. Furthermore, the requested additional time will allow the parties to continue their attempts to resolve this matter without further court action. Accordingly, the parties agree that a 21 day extension to the response deadline is appropriate. This short 21 day extension will not unduly delay proceedings as this case is still in its infancy as it was filed less than a month ago and no scheduling order is currently in place. This stipulation is entered into in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court extend Digital Moose's deadline to answer or otherwise respond to the Complaint by 21 days, or to April 20, 2020.

DATED this 27th day of March, 2020.

DATED this 27th day of March, 2020.

EISENBAND LAW, PA

ARMSTRONG TEASDALE LLP

By: /s/Michael Eisenband

By: /s/Michelle D. Alarie

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3-27-2020